



RR:0024

# University of Hawaii at Manoa

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Office of the Director

June 10, 1975

## MEMORANDUM

TO: Shinji Soneda, Chief  
Environmental Protection and Health  
Services Division  
Hawaii State Department of Health

FROM: Jerry M. Johnson, Assistant Director  
Environmental Center

SUBJECT: Proposed Amendment of Chapter I - Sanitation

Of the three purposes for proposing amendments to Chapter I, two are major. The one dealing with sanitary appurtenances appears to be merely a housekeeping measure to bring Chapter I - Sanitation into conformity with previous changes to the Chapter. Thus we believe this proposed change is reasonable and logical.


With regard to the other two purposes for proposing amendments our comments are as follows:

1) The proposed amendments dealing with unsafe beaches would remove the requirement that the Director of Health must post unsafe natural bathing places. This change would give the Director greater flexibility in how he can deal with specific bathing beach problems. The underlying rationale is, undoubtedly, the notion that at times it is politically or socially imprudent to post beaches in that public reaction can be more of a problem than the actual bathing hazard.

2) The section on classification of bathing beaches is to be deleted. Although we tend to feel comfortable when we have a neat and rational system of classification for the environment and certainly the enforcement function is simplified with such a system, the existing system of classifying bathing beaches is not only an arbitrary one but one for which there is no existing rationale. We can find, in the literature, no semblance of a relationship between the levels of coliforms in sea water and potential or real hazard to human health.

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In summary, we see reasonable justification for each of the proposed changes in the Sanitation Regulations. Our only concern is that the proposed changes, if enacted, will make it more difficult for the Director of Health to take direct and immediate action in dealing with unsafe natural bathing area controversies.

  
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Jerry M. Johnson

P.S. If you would like to have us read this statement at the scheduled hearing, please let us know. I can be reached at 948-7361.